

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LABORATORY SKIN CARE, INC. and)	
ZAHRA MANSOURI)	
)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 06-00601-KAJ
)	
LIMITED BRANDS, INC. and)	
BATH AND BODY WORKS, INC.)	
)	
Defendants)	JURY TRIAL DEMANDED
)	

REPLY TO COUNTERCLAIMS

Plaintiffs, Zahra Mansouri and Laboratory Skin Care[®], Inc. (“LSC”), reply to the counterclaims of Defendants Limited Brands, Inc. (“Limited Brands”) and Bath and Body Works, Inc. (“BBW”) as follows:

PARTIES

1. Plaintiffs admit the allegations in paragraph 1 of the counterclaim.
2. Plaintiffs admit the allegations in paragraph 2 of the counterclaim.
3. Plaintiffs admit the allegations in paragraph 3 of the counterclaim.

JURISDICTION

4. Plaintiffs admit that this is an action arising under the Patent Laws of the United States. The remaining allegations of paragraph 4 state legal conclusions not requiring a response. To the extent a response to those allegations is required, the allegations are denied.

5. Plaintiffs admit that Ms. Mansouri is the owner of the '516 patent, that LSC is the exclusive licensee, that Plaintiffs have alleged that Defendants infringe the '516 patent, and that Defendants have alleged that the '516 patent is invalid and unenforceable. Plaintiffs deny the remaining allegations of paragraph 5 of the counterclaim.

6. Plaintiffs deny the allegations in paragraph 6 of the counterclaim.

7. Plaintiffs admit that this Court has subject matter jurisdiction over the action based on 28 U.S.C. §§ 1331 and 1338. The remaining allegations of paragraph 7 state legal conclusions not requiring a response. To the extent a response to those allegations is required, the allegations are denied.

8. Plaintiffs admit the allegations in paragraph 8 of the counterclaim.

FIRST COUNTERCLAIM

9. Plaintiffs incorporate herein the replies set forth in paragraphs 1 through 8 above.

10. Plaintiffs deny the allegations in paragraph 10 of the counterclaim.

SECOND COUNTERCLAIM

11. Plaintiffs incorporate herein the replies set forth in paragraphs 1 through 8 above.

12. Plaintiffs deny the allegations in paragraph 12 of the counterclaim.

THIRD COUNTERCLAIM

13. Plaintiffs incorporate herein the replies set forth in paragraphs 1 through 8 above.

14. Plaintiffs deny the allegations in paragraph 14 of the counterclaim.

15. Plaintiffs deny the allegations in paragraph 15 of the counterclaim.

16. Plaintiffs deny the allegations in paragraph 16 of the counterclaim.

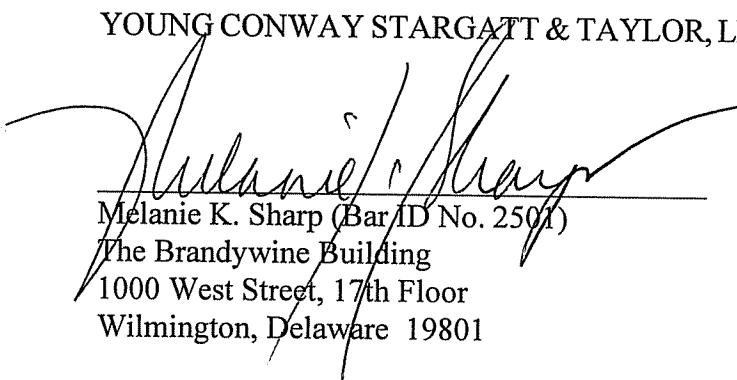
17. Plaintiffs deny the allegations in paragraph 17 of the counterclaim.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment:

- A. Dismissing Defendants' counterclaims with prejudice;
- B. Denying the relief sought in Defendant's counterclaims;
- C. Awarding Plaintiffs the relief sought in their complaint;
- D. Awarding Plaintiffs their costs, attorney's fees, and expenses in this action; and
- E. Awarding Plaintiffs such further relief as the Court deems just and appropriate.

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Dated: November 13, 2006

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CERTIFICATE OF SERVICE

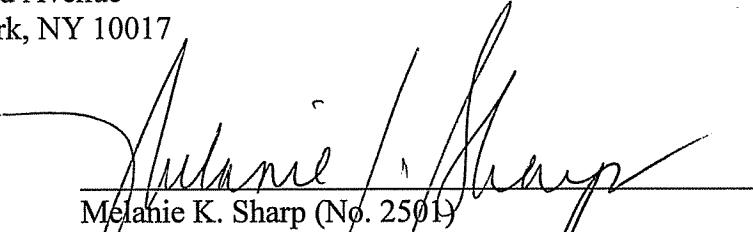
I, Melanie K. Sharp, Esquire, hereby certify that on November 13, 2006, I caused to be electronically filed a true and correct copy of the foregoing document, Reply to Counterclaims with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that on November 13, 2006, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

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